



DEPARTMENT OF PUBLIC HEALTH
CITY OF CHICAGO

August 16, 2017

Kim R. Walberg
TAFT STETTINIUS & HOLLISTER LLP
111 East Wacker, Suite 2800
Chicago, IL 60601

Re: S. H. Bell Company, 10218 South Avenue O
Response to Revised Fugitive Dust Plan

Dear Ms. Walberg,

The Chicago Department of Public Health ("CDPH") was disappointed to review the findings by the U.S. Environmental Protection Agency ("USEPA") on August 7, 2017, that found manganese amounts exceeding chronic inhalation exposure levels established by USEPA and the Agency for Toxic Substances and Disease Registry at S.H. Bell's facility in Chicago. Our highest priority is to protect the health of all Chicago residents in every neighborhood. As such, CDPH, in cooperation with state and federal agencies, will utilize all options available to ensure Chicago residents breathe clean and healthy air.

We expect S.H. Bell to take all necessary steps to greatly reduce or eliminate manganese emissions at the facility. To that end, we request that you submit a more robust, quantifiable and protective fugitive dust plan as soon as possible, no later than September 6th, 2017. The revised plan must address all questions and concerns CDPH has recently raised with S.H. Bell, including the following changes to the last version of the plan dated April 2017:

1. Proactive Reportable Action Level response plan. This plan would trigger specific, proactive response activities when monitors indicate elevated levels of particulate matter. These levels should be stricter than those currently proposed by S.H. Bell and stricter than the federal National Ambient Air Quality Standard, so that action can be taken to prevent a violation before it occurs. It is important to include strict hourly level triggers, in addition to daily levels, to ensure timely and effective response actions. CDPH recommends hourly average levels lower than 300 ug/m^3 and daily average levels lower than 150 ug/m^3 . In addition, the required dust monitoring contingency plan must include a range of increasingly aggressive measures (including, but not limited to, Method 9 readings, dust control, and ceasing activity) appropriate to different levels of exceedance. Thus, actions should be planned for multiple levels, ranging from low and medium, to high and very high monitor readings.
2. Stricter operations control for barge loading and unloading. The plan must explain how material on barges is prevented from being dispersed during operations, in the

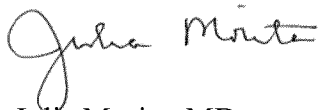
- first instance, before any triggering event occurs, especially for materials that cannot be watered. In addition, CDPH requests S.H. Bell adjust the current practices during unloading and managing of super sacks at the northern dock. It would be preferable for the sacks to be opened and released directly into the truck, with the baghouse operating, instead of released to a pile on the ground prior to being loaded onto a truck.
3. Stronger precautions at outdoor storage piles. The plan must clearly show how material is not exposed to the wind during storage, using doors, covers or other means. The plan should strengthen all precautions, and especially for material that is ½ inch in diameter or smaller and all manganese-containing material. Such material of concern should rarely, if ever, be stored outdoors, so the plan should be clear regarding the conditions and controls placed on any temporary outdoor storage piles. CDPH would prefer the material to remain on an enclosed barge until indoor space becomes available. In addition, for non-manganese material greater than ½ inch in diameter, CDPH recommends that S.H. Bell increase inspections and watering of outdoor storage piles to ensure they do not generate fugitive dust.
 4. Measurable and consistent dust control measures. The current plan relies too heavily on a subjective “as needed” standard for watering and other measures. In the revised plan, there must be prescriptive and quantifiable language to ensure dust is being adequately mitigated during all storage, handling and transport activities. For example, CDPH encourages more frequent use of the dry fogging system, not just in freezing weather conditions. In addition, to prevent material from blowing off trucks, CDPH suggests that, in addition to waiting one minute after a truck is loaded before leaving the Ryerson or Norcon buildings, the trucks should be covered prior to exiting the building. Further, the plan should include a maintenance schedule and sample logs for all baghouse equipment. A timeline for the installation and operation of all dust collection control devices discussed in the fugitive dust plan should be provided.
 5. Specific procedures to prevent dust from entering public roadways. The Bulk Material Rules require a wheel wash station unless other measures are in place to ensure trucks will not cause any track-out of materials. Accordingly, the plan must explain how trucks are cleaned before leaving the site in the absence of a wheel wash station, and how dust is suppressed on roadways to prevent track-out. For example, in addition to watering and sweeping, the plan might provide for a minimum use of the chemical dust suppressant for the roadways at least once a month. In addition, since the facility closes at 3:00 p.m., the plan should provide for one final sweep to remove debris at the end of the day, or a third party to clean the roadways each evening, to address any residual material left on roadways.
 6. Detailed methods for visually observing dust. The plan should detail how S.H. Bell will visually monitor operations to ensure dust is being properly minimized well before it is detected by air monitors. For example, your current plan to observe visible emissions “once per working shift,” and to use subjective standards of “normal” and “abnormal” emissions, is insufficient. In addition, opacity readers should be situated at points, and under conditions, most likely to detect the greatest amount of dust emissions.

7. Clearly delineated materials storage and handling methods. Except as otherwise addressed in response to the comments above, CDPH requests S.H. Bell to provide answers to the questions regarding material handling and storage as posed by the Southeast Side Coalition to Ban Petcoke, Natural Resources Defense Council, and Southeast Environmental Task Force, in their letter dated July 7, 2017.

Please note that S.H. Bell should expect additional inspections of its facility to ensure that its current operations are not in violation of City regulations. Further, we ask for S.H. Bell's cooperation with the southeast side manganese study announced by Mayor Emanuel and CDPH on August 7, 2017 as we investigate all companies who may use manganese and the impact to residents' health in the area.

Thank you for your prompt attention to this important matter. If you have any questions, please contact Assistant Commissioner Dave Graham, at (312) 745-4034.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Morita". The signature is fluid and cursive, with the first name "Julie" being more prominent than the last name "Morita".

Julie Morita, MD
Commissioner
Chicago Department of Public Health